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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WENDY STARLAND,

Plaintiff,

vs.

ROB FUSARI AND ROB FUSARI
PRODUCTIONS, LLC,

Defendants.

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: CIVIL ACTION
: CASE NO.:10-CV-04930-JLL-MAH
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**NOTICE OF MOTION OF PLAINTIFF FOR SUMMARY
JUDGMENT ON THE AFFIRMATIVE DEFENSES OF DEFENDANTS,
THE COUNTERCLAIMS OF DEFENDANT ROB FUSARI AND
HER CLAIM TO IMPOSE A CONSTRUCTIVE TRUST**

PLEASE TAKE NOTICE that, upon the declaration of William Dunnegan sworn to August 12, 2013, the statement pursuant to Rule 56.1 of the Civil Rules of this Court, and all prior proceedings in this action, plaintiff Wendy Starland ("Starland") will move before the Honorable Jose L. Linares in Courtroom 5D of the Martin Luther King Federal Building and

Courthouse, 50 Walnut Street, Newark, New Jersey, at 9:30 am on September 16, 2013, or as soon thereafter as counsel may be heard, for an Order (i) granting summary judgment in favor of Starland on the affirmative defenses of defendants, and the counterclaims of defendant Rob Fusari, (ii) granting Starland summary judgment that, if the jury finds that defendants are liable to Starland for a percentage of their future revenue resulting from their relationship with Stefani Germanotta p/k/a Lady Gaga, then Starland is entitled to a constructive trust on that future revenue, and (iii) granting for such other and further relief as may be just and proper.

Dated: August 12, 2013

**COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.**

By s/David M. Kohane
David M. Kohane

DUNNEGAN & SCILEPPI LLC

By s/William Dunnegan
William Dunnegan

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